REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-66 are presently active. Claims 1-3, 6, 7, 9, 32, 40, 63, and 66 have been presently amended.

In the outstanding Office Action, Claims 1, 32, 63, and 66 were objected to. Claims 1-25, 32-56, and 63-66 were rejected under 35 U.S.C. § 103 as being unpatentable over Sonderman et al (U.S. Pat. No. 6,802,045) in view of Kee et al (U.S. Pat. No. 5,583,780). Claims 26-28 and 57-59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sonderman et al and Kee et al in view of Fatke et al (U.S. Pat. Appl. No. 200510016947).

Regarding the claim objections, Claims 1, 32, 63, and 66 have been amended to address the informality identified. Thus, it is respectfully submitted the claim objection has been overcome.

Applicant acknowledges with appreciation the courtesy of Examiner Seik to interview this case on October 28, 2005 during which time the issues in the outstanding final Office Action were discussed, as substantially summarized herebelow.

The outstanding Office Action acknowledges that <u>Sonderman et al</u> do not disclose a first principles physical model including a set of computer-encoded differential equations, the first principles physical model describing at least one of a basic physical or chemical attribute of the semiconductor processing tool is inputted.¹ The Office Action thereafter asserts that integrating the differential equations taught by <u>Kee et al</u> into <u>Sonderman et al</u>'s models would have been obvious to practitioners in the art at the time of the invention.

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¹ Office Action, page 3, lines 10-15.

Claim 1 as clarified defines a method for analyzing a process performed by a semiconductor processing tool that: (1) inputs process data relating to an actual process being performed by the semiconductor processing tool, (2) inputs a first principles physical model which includes a set of computer-encoded differential equations and which describes at least one of a basic physical or chemical attribute of the semiconductor processing tool, (3) performs a first principles simulation using the physical model to provide a first principles simulation result *in accordance with the process data relating to the actual process being performed in order to simulate the actual process being performed*, and (4) uses the first principles simulation result to determine a fault in the actual process being performed by the semiconductor processing tool. (The numbers have been added for illustrative purposes only.)

Besides the fact that <u>Sonderman et al</u> do not teach a first principles model including a set of computer-encoded differential equations, it was discussed that the feedback as depicted in Figure 1 of <u>Sonderman et al</u> between the metrology data analysis unit and the simulation environment 210 was feedback used in <u>Sonderman et al</u> for updating the manufacturing model. However, these updates result in the regeneration of "new" manufacturing recipes. As such, the "new" simulation performed in <u>Sonderman et al</u> is on a process that has already been performed.

To this point, please find below a series of recitations from Sonderman et al that illustrate this point. This series of recitations starts with a disclosure in Sonderman et al that discloses a feature of "feedback corrections during the manufacturing of semiconductor wafers." When viewed in the context of the entirety of the teachings in Sonderman et al, this feature of "feedback corrections during the manufacturing of semiconductor wafers" is seen to refer to corrections from run-to-run and not feedback corrections of an actual process being performed. Sonderman et al disclose that (with emphasis added):

The simulation environment 210 also comprises a process control interface 350, which is an interface that allows communications between the simulation environment 210 and the process control environment 180. The process control interface 350 also allows the simulation environment 210 to receive manufacturing data from the manufacturing environment 170, which can be used by the simulation environment 210 to perform feedback corrections during the manufacturing of semiconductor wafers. Col. 5, lines 18-26.

In one embodiment, the computer system 130 sends control input signals, or manufacturing parameters, on the line 123 to the first and second machine interfaces 115a, 115b. The computer system 130 employs a manufacturing model 140 to generate the control input signals on the line 123. In one embodiment, the manufacturing model 140 contains *a manufacturing recipe* that determines a plurality of control input parameters that are sent on the line 123. Col. 4, lines 10-17.

Once the system 100 performs the process simulation function, the system 100 performs an interfacing function, which facilitates interfacing of the simulation data with the process control environment 180 (block 430). The process control environment 180 can utilize the simulation data in order to modify or define manufacturing control parameters that control the actual processing steps performed by the system 100. Once the system 100 interfaces the simulation data with the process control environment 180, the system 100 then performs a manufacturing process based upon the manufacturing parameters defined by the process control environment 180 (block 440). Col. 6, lines 35-46.

Once the system 100 validates the defined models, the system 100 acquires data to operate the defined models (block 630). In one embodiment, the system 100 acquires data from the computer system 130 in order to operate the defined models. The system 100 then populates the defined models with the data acquired by the system 100 for operation of the models (block 640). In other words, the system 100 sends operation data, control parameter data, simulation data, and the like, to the defined models so that the defined models can perform a simulation as if an actual manufacturing process were being performed. Col. 7, lines 8-20.

Turning now to FIG. 8, a simplified process control system block diagram is illustrated. The controller 810 controls a process 820 that is performed on a silicon wafer. The input to the controller on a line 805 is denoted by the term X_{Ti} , which represents a target performance of the processed semiconductor wafer (S_i). Once a particular silicon wafer, S_i , is processed, metrology results 830 will define the actual performance of the processed semiconductor wafer S_i , which is denoted by the term X_{Ai} . The actual performance factor, X_{Ai} is fed back into the line 805 which is sent to the controller for further adjustments. Col. 9, lines 1-11.

Hence, it is respectfully submitted that Sonderman et al disclose a process feedback from run-to-run. This is seen by the feedback of a realized performance factor once a particular silicon wafer is processed, and the utilization of this data to produce through the manufacturing model 140 a "new" process recipe from this historical data to predict future simulation results for further runs.

Thus, when taken as a whole, the teachings of Sonderman et al do not disclose or suggest performing first principles simulation using a physical model to provide a virtual sensor measurement in accordance with the process data relating to the actual process being performed in order to simulate the actual process being performed, as defined in the independent claims.

Similar to the simulation results in Sonderman et al, Kee et al disclose the use of a first principles physical model upfront to produce a model of a rapid thermal processing (RTP) reactor. As disclosed in Kee et al:

once a particular thermal process has been modeled for a particular set of control parameters, the device may then be used to automatically obtain the necessary control parameters to achieve a desired result.² [emphasis added]

As more fully described below, the modeling apparatus can be used to first model the spectral radiation transport in the RTP reactor 201 and then to receive a prescribed wafer time-dependent temperature profile and provide the necessary time-dependent lamp intensity control to achieve the proscribed profile.3

Kee et al describe from col. 11, line 14, to col. 12, line 33, describes the development of a modeling apparatus therein by (1) the input of data concerning the rapid thermal processor (not process data from an actual anneal), (2) model simulation, and (3) experimental comparison and model validation.

³ Id., col. 10, lines 41-45.

² Kee et al, col. 4, lines 33-36.

Indeed, in col. 12, lines 19-33 of Kee et al, the model results obtained in Kee et al are corroborated by comparison to actual data in order to develop the "confidence to predict" effects of various approximations in the radiation transport. Thus, initial data used in the development of the model result in Kee et al is *not process data from an actual process* being performed. Rather, in Kee et al, the actual data is used in the experimental comparison and model validation steps disclosed therein.

Accordingly, there is no disclosure, suggestion, or motivation in <u>Sonderman et al</u> or <u>Kee et al</u> to input process data relating to an actual process being performed by the semiconductor processing tool and (2) perform a first principles simulation using the physical model to provide a virtual sensor measurement in accordance with the process data relating to the actual process being performed in order to simulate the actual process being performed, as defined in the independent claims.

Moreover, the examiner's attention is directed to <u>Jain et al</u>, "Mathematic-Physical Engine: Parallel Processing for Modeling Simulation of Physical Phenomena" reported in the attached PTO 1449 form. <u>Jain et al</u> "proposes" a parallel processing *concept* for the solution of physical phenomena described by partial differential equations. <u>Jain et al</u> detail at page 367 that goals of a specific Mathematic-Physical Engine (MPE) may include: model verification, response visualization, event verification, detection of small events, model compaction simplification, optimization of parameters and inputs, feasibility determinations. This list does not propose the use of a MPE for process control. Moreover, even the "dedicated" MPE of <u>Jain et al</u> is also a conceptual tool envisioned by <u>Jain et al</u> to be realizable through the hardware development of a "stacked wafer" processor architecture. The MPE of <u>Jain et al</u> is only a concept tool. As such, <u>Jain et al</u> provide no basis upon which one of ordinary skill in the art would have any reasonable expectation of success that the proposed MPEs could provide process control.

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Hence, it is respectfully submitted that independent Claims 1, 32, 63, and 66 and the claims dependent therefrom patentably define over the cited references.

Consequently, in light of the above discussions, the outstanding grounds for rejection are believed to have been overcome. The application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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